

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA
Title III

as representative of

NO. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO,
THE EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT AND THE PUERTO RICO
PUBLIC BUILDINGS AUTHORITY,

Jointly Administered

Debtors

PRO SE OBJECTION BASED ON A MATTER OF FACT ISSUE FROM
NON DEBTORS CLASS ON BOARD

ANNEXED ASSESMENTS

1. GENERAL BRIEF ABOUT A GERRYMANDERING OPTION II
2. CLASSIFICATION OF LITIGATIONS FACTORS
3. AN EXAMPLE PLAN OF A
4. GENERAL BRIEF ABOUT A GERRYMANDERING OPTION I
5. OBJECTIONS TO DISCLOSURE STATEMENT
6. AGENCY BUSINESS & ECONOMIC BACKGROUND ISSUES
7. AGENCY RESTRICTIONS AT THE OUTLOOK
8. AGENCY UPDOWN ON THE FINANCIAL STATEMENTS
9. PERSONAL & PRIVATE AGENCY CREDITOR RELEASES
10. FEASIBILITY PENSION AGENCY PROGRAM PAYMENTS
11. THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT

RESPECTFULLY SUBMITTED,



ANA A. NÚÑEZ VELÁZQUEZ
19 RES. VILLANUEVA APTO 170
AGUADILLA, PUERTO RICO 00603

DATED: JULY 12, 2021
AGUADILLA PR 00603

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

GENERAL BRIEF ABOUT A GERRYMANDERING OPTION
REVIEWING THE DEBTORS AND CREDITORS BEST ANSWER

SELECT (✓) THE CORRECT ANSWER AND DISCUSS

✓ CREDITORS PARTICIPANTS AT PROMESA T.III

✓ DEBTORS PARTICIPANTS AT PROMESA T.III

PRIME BACKUP RESERVES	GERRYMANDERING STANDING OPTIONS		
	BEFORE JA	DURING JA	AFTER JA
1. JUDGMENTS			
2. DAMAGES			
3. DEBTS			
4. RIGHTS			
5. REMEDIES			
6. CAUSES OF ACTIONS			
7. LIABILITIES			
8. FELONIES			
9. KICKBACK			
10. PAY AS YOU...			
11. LOBBYIST ON...			
12. VULTURE ON...			
TOTAL AVERAGE			
JA (JOINTLY ADMINISTERED)			

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 11, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS BY THE
"OBJECTIONS FROM ANA A. NÚÑEZ VELÁZQUEZ
LIKE A COMMONWEALTH OF PUERTO RICO DEBTOR TO
THE FINANCIAL OVERSIGHT & MANAGEMENT BOARD FOR
PUERTO RICO ON DISCLOSURE STATEMENT"

(TO BE COMPLETE BY THE ERS HARDWARE RECORDS SINCE 1991 THRU 2003 & 2012)

MONTH & YEAR	EMPLOYEE ERS CONTRIBUTION	ERS AGENCY % INTEREST	ERS AGENCY CREDITOR	ERS AGENCY DEBTOR	ERS AGENCY BANKRUPT
4/1991					
4/1992					
4/1993					
4/1994					
4/1995					
4/1996					
4/1997					
4/1998					
4/1999					
4/2000					
4/2001					
4/2002					
4/2003					
8/2012					
9/2012					
10/2012					
TOTAL AVERAGE					

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 9, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

AN EXAMPLE PLAN OF A
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD

GENERAL BRIEF ABOUT A GERRYMANDERING OPTION
REVIEWING THE DEBTORS AND CREDITORS BEST ANSWER

GERRYMANDERING OPTIONS	AMONG DUE PERCENTAGES APPLICATION			
	PRINCIPAL	HIGH INTEREST	LOW INTEREST	FEE CHARGES
$\geq 65\%$ FOR TWENTY (20) YEARS BY LITIGATION VALUATION				
45% FOR TWENTY (20) YEARS BY LITIGATION VALUATION				
$\leq 25\%$ FOR TWENTY (20) YEARS BY LITIGATION VALUATION				
TOTAL AVERAGE				
ANA A. NÚÑEZ VELÁZQUEZ ANALYST JULY 10, 2021				

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

AN EXAMPLE PLAN OF A
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD

GENERAL BRIEF ABOUT GERRYMANDERING PAYABLE OPTIONS
REVIEWING THE DEBTORS AND CREDITORS BEST ANSWER

SELECT (✓) THE CORRECT ANSWER AND DISCUSS

✓ CREDITORS AT THE FINANCIAL OVERSIGHT

✓ DEBTORS AT THE FINANCIAL OVERSIGHT

GERRYMANDERING PAYABLE OPTIONS	AMONG DUE PERCENTAGES APPLICATION			
	PRINCIPAL	HIGH INTEREST	LOW INTEREST	FEE CHARGES
0%				
5%				
15%				
25%				
35%				
45%				
55%				
65%				
75%				
85%				
TOTAL AVERAGE				

ANA A. NÚÑEZ VELÁZQUEZ

ANALYST

JULY 10, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS BY THE
"OBJECTIONS TO DISCLOSURE STATEMENT"
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS SINCE 1985 THRU 2020)

I
AGENCY PERFORMANCE ON A REASONABLENESS VIEW

MONTH & YEAR	EMPLOYEES CONTRIBUTION	EMPLOYMENT CONTRIBUTION	GENERAL FUNDING	AGENCY SAVINGS	AGENCY % INTEREST
7/1985					
7/1990					
7/1995					
7/2000					
7/2005					
7/2010					
7/2015					
7/2020					
TOTAL AVERAGE					

II
AGENCY FINANCIAL & COMMERCIAL ON A REASONABLENESS VIEW

MONTH & YEAR	EMPLOYEES PERSONAL LOANS & GRANTS	LOAN & GRANTS % INTEREST	ERS STOCK	ERS CAPITAL MARKET	ERS COMMON BUSINESS
7/1985					
7/1990					
7/1995					
7/2000					
7/2005					
7/2010					
7/2015					
7/2020					
TOTAL AVERAGE					

III
AGENCY FISCAL RISK ON A REASONABLENESS VIEW

MONTH & YEAR	INFRASTRUCTURE COST & PAYROLL	ERS RETIREE PAYBACK	DOWN #EMPLOYEES	DOWN INCOME	NEW ERA COMMON DUE
7/1985					
7/1990					
7/1995					
7/2000					
7/2005					
7/2010					
7/2015					
7/2020					
TOTAL AVERAGE					

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 9, 2021

**THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO**

**CLASSIFICATION OF LITIGATIONS FACTORS
AGENCY BUSINESS & ECONOMIC BACKGROUND ISSUES
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS SINCE 1985 THRU 2020)**

I. REGAIN FISCAL RESPONSIBILITY

**SLOW DOWNLOAD AT THE PAYBACK FOR THE RETIREE
& UPDATE THE ACTIVE GROSS CONTRIBUTION 14-22%
FROM PUBLIC OR PRIVATE EMPLOYEES AND EMPLOYERS**

MONTH & YEAR	PROPER BUDGET	EXCLUSIVE DEBIT	SAVINGS CREDI RESERVE	GETPUT DUE FROM...
7/1985				
7/1990				
7/1995				
7/2000				
7/2005				
7/2010				
7/2015				
7/2020				
TOTAL AVERAGE				

II. RESTRUCTURE ITS DEBITS

**SLOW DOWNLOAD AT THE PAYBACK FOR THE RETIREE
& UPDATE THE ACTIVE GROSS CONTRIBUTION 14-22%
FROM PUBLIC OR PRIVATE EMPLOYEES AND EMPLOYERS**

MONTH & YEAR	PROPER BUDGET	SAVINGS DEBT RESERVE	401K & IRA'S	OUTPUT DUE FROM ... TO
7/1985				
7/1990				
7/1995				
7/2000				
7/2005				
7/2010				
7/2015				

7/2020
TOTAL AVERAGE

III. GAIN ACCESS TO CAPITAL MARKETS

**SLOW DOWNLOAD AT THE PAYBACK BY THE RETIREE
ACCOUNT & UPDATE THE ACTIVE GROSS CONTRIBUTION
14-22% FROM PUBLIC OR PRIVATE EMPLOYEES AND
EMPLOYERS**

MONTH & YEAR	PROPER BUDGET	SAVINGS DEBIT RESERVE	401K & IRA'S	INVESTMENT & STOCKS
7/1985				
7/1990				
7/1995				
7/2000				
7/2005				
7/2010				
7/2015				
7/2020				
TOTAL AVERAGE				

**ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 8, 2021**

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS
AGENCY RESTRICTIONS AT THE OUTLOOK
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS AT 2020)

I. CLASS 48A (RETIRED ERS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	UPDATE CLAIMS	PREEMPTION AT THE FISCAL PLAN			
		UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL AVERAGE					

II. CLASS 48B (RETIRED JRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	UPDATE CLAIMS	PREEMPTION AT THE FISCAL PLAN			
		UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL AVERAGE					

III. CLASS 48C (RETIRED TRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	UPDATE CLAIMS	PREEMPTION AT THE FISCAL PLAN			
		UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL AVERAGE					

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 8, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS
AGENCY UPDOWN ON THE FINANCIAL STATEMENTS
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS AT 2020)

I. CLASS 48A (RETIRED ERS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA	PARTICIPANTS REORGANIZE AT THE FISCAL PLAN				
MEMBERS	UPDATE CLAIMS	UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL					
AVERAGE					

II. CLASS 48B (RETIRED JRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA	PARTICIPANTS REORGANIZE AT THE FISCAL PLAN				
MEMBERS	UPDATE CLAIMS	UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL					
AVERAGE					

III. CLASS 48C (RETIRED TRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA	PARTICIPANTS REORGANIZE AT THE FISCAL PLAN				
MEMBERS	UPDATE CLAIMS	UNSECURED CLAIMS	401K	IRA'S	%AVERAGE
A. INPUT					
B. GETPUT					
C. OUTPUT					
D. STAND BY					
TOTAL					
AVERAGE					

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 8, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS
PERSONAL & PRIVATE AGENCY CREDITOR RELEASES
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS AT 2020)

I. CLASS 48A (RETIRED ERS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	LOAN & BUSINESS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$3,000.00$	$\geq \$3,000.00$	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

II. CLASS 48B (RETIRED JRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	LOAN & BUSINESS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$3,000.00$	$\geq \$3,000.00$	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

III. CLASS 48C (RETIRED TRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	LOAN & BUSINESS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$3,000.00$	$\geq \$3,000.00$	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 8, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO

CLASSIFICATION OF LITIGATIONS FACTORS
FEASIBILITY PENSION AGENCY PROGRAM PAYMENTS
(TO BE COMPLETE BY THE ERS HARDWARE RECORDS AT 2020)

I. CLASS 48A (RETIRED ERS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	PENSIONS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$1,500.00$ p/m	$\geq \$1,500.00$ p/m	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

II. CLASS 48B (RETIRED JRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	PENSIONS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$1,500.00$ p/m	$\geq \$1,500.00$ p/m	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

III. CLASS 48C (RETIRED TRS PARTICIPANT BELOW - THRESHOLD CLAIMS)

DATA MEMBERS	PENSIONS REORGANIZE AT THE FISCAL PLAN		
	$\leq \$1,500.00$ p/m	$\geq \$1,500.00$ p/m	% AVERAGE
A. INPUT			
B. GETPUT			
C. OUTPUT			
D. STAND BY			
TOTAL AVERAGE			

ANA A. NÚÑEZ VELÁZQUEZ
ANALYST
JULY 8, 2021

THE EMPLOYEES RETIREMENT SYSTEM OF THE
COMMONWEALTH OF PUERTO RICO

I. THE PLAN'S CLASSIFICATION SCHEME COMPLIES WITH

A. DONE RIGHT

B. DONE RIGHT

C. DONE RIGHT

D. REVIEW PURPOSE

1. "ADOPTED A PERMISSIVE APPROACH TO CLASSIFICATION"

(REVIEW PURPOSE NUMBER 1)

APPROACH TO CLASSIFICATION SUPPORTING IN
A RELEVANT CASE LAW, LOGIC AND COMMON SENSE
TO BE COMPLETE WITH THE "ERS HARDWARE"

MONTH/YEAR	BASIC LAW	#EMPLOYEES	#RETIREEES	< WAGES	> WAGES	% ERS
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7/1985

7/1990

7/1995

7/2000

7/2005

7/2010

7/2015

7/2020

TOTAL
AVERAGE

E. REVIEW PURPOSE

1. "RETIREE CLAIMS AND GENERAL UNSECURED CLAIMS

CAN AND MUST BE CLASSIFIED TOGETHER"

2. "SETTLEMENT PROVIDES BOTH BUSINESS AND ECONOMIC

JUSTIFICATIONS FOR SEPARATE CLASSIFICATION"

(REVIEW PURPOSE NUMBER 1)

RETIREE CLAIMS TOGETHER IN A RELEVANT CASE LAW,
LOGIC AND COMMON SENSE TO BE COMPLETE WITH THE
"ERS HARDWARE"

MONTH/YEAR	BASIC LAW	RETIREE CLAIMS/ERS GROSS PAY	UNSECURED CLAIMS/ERS HOLD PAY
------------	-----------	------------------------------	-------------------------------

7/1985

7/1990
7/1995
7/2000
7/2005
7/2010
7/2015
7/2020
TOTAL AVERAGE

(REVIEW PURPOSE NUMBER 2)
SETTLEMENT PROVIDES BOTH BUSINESS & ECONOMIC STATUS
IN A RELEVANT CASE LAW, LOGIC AND COMMON SENSE TO BE COMPLETE
WITH THE "ERS HARDWARE"

MONTH/YEAR	BASIC LAW	RETIREE CLAIMS/CURRENT DUE	UNSECURED CLAIMS/HOLD DUE
7/1985			
7/1990			
7/1995			
7/2000			
7/2005			
7/2010			
7/2015			
7/2020			
TOTAL AVERAGE			

ANA A. NÚÑEZ VELÁZQUEZ
ERS "DEBTORS" DEPONENT
19 BERNARDINO VILLANUEVA APTO 170
AGUADILLA PR 00603